

TTAB

IN THE UNITED STATES PATENT
AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

JOYCE LOPETEGUY
6717 Kimberly Street
Bakersfield, California 93308

74185211
Cancellation No. 92047342
Registration No. 1,694,622

Vincent M. Amberly
Litman Law Offices, Ltd.
Post Office Box 15035
Arlington, Virginia 22215

Imagination Holdings Pty. Ltd.

v.

Joyce Lopeteguy


ANSWER TO PETITION FOR CANCELLATION OF TRADEMARK

COMES NOW, Registrant, Joyce Lopeteguy, and responds to the Petition
for Cancellation as follows:

As to the first paragraph of the Petition, Registrant, on information and
belief, admits the allegations contained therein.

As to the second paragraph of the Petition, Registrant admits the
allegations contained therein.

As to the third paragraph of the Petition, Registrant denies the allegations
contained therein.


05-07-2007

1. As to the allegations contained in Paragraph 1, Registrant is without sufficient information or belief to form an opinion as to the veracity of those allegations and, therefore, on that basis, denies the same.

2. The allegations contained in Paragraph 2 are denied. Registrant further states, affirmatively, that the fact that the term is used by others, or even that the term appears in several hits on Google, is irrelevant. The issue is how the term is used and whether, by means of the primary significance test, the term in the minds of the consuming public relates to the product or the producer.

3. As to the allegations contained in Paragraph 3, Registrant is without sufficient information or belief to form an opinion as to the veracity of those allegations and, therefore, on that basis, denies the same.

4. The allegations contained in Paragraph 4 are denied.

5. The allegations contained in Paragraph 5 are denied.

6. The allegations contained in Paragraph 6 are denied.

7. The allegations contained in Paragraph 7 are denied.

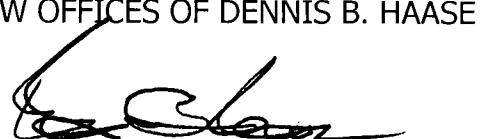
WHEREFORE, Registrant prays that the Petition of Imagination Holdings Pty. Ltd. be denied, with prejudice, and that the Board grant such other and further relief as may be appropriate, including but not limited to, costs and attorneys' fees.

Dated: May 4, 2007

Respectfully submitted,

LAW OFFICES OF DENNIS B. HAASE

By

A handwritten signature in black ink, appearing to read 'Dennis B. Haase', written over a horizontal line.

Dennis B. Haase

Registration No. 22,037

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Attorney for Registrant

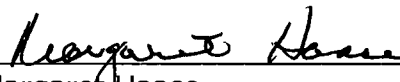
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Vincent M. Amberly, Esq.
Litman Law Offices, Ltd.
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Arlington, Virginia 22215

on May 4, 2007.


Margaret Haase